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		Application Number	09/496,600
		Filing Date	February 2, 2000
		First Named Inventor	Hang Zhang
		Group Art Unit	2143
		Examiner Name	Alina A. Boutah
Total Number of Pages in This Submission	6	Attorney Docket Number	50325-0109

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SIGNATURE OF APPLICANT, ATTORNEY, OR AGENT

Firm or Individual name	Hickman Palermo Truong & Becker LLP Lawrence R. Goerke, Reg. No. 45,927
Signature	
Date	June 20, 2006

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

In re application of:

Confirmation No. 6479

Hang ZHANG, et al.

Group Art Unit No.: 2143

Serial No.: 09/496,600

Examiner: Alina A. Boutah

Filed: February 2, 2000

For: METHOD AND APPARATUS FOR BROWSING A MANAGEMENT
INFORMATION BASE

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REPLY BRIEF

Sir/Madam:

Further to the Notice of Appeal filed November 29, 2004, and in reply to the Examiner's Answer mailed April 20, 2006, Appellants hereby submit their Reply Brief pursuant to 37 C.F.R. § 41.41(a-b).

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On June 20, 2006 By Martina, Placed

I. STATUS OF CLAIMS

Claims 1-44 are pending in this Application and are listed in the Claims Appendix submitted with the Supplemental Appeal Brief dated January 4, 2006. Claims 1-44 stand under final rejection and are the subject matter of this Appeal.

II. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

Claims 1-44 stand rejected under 35 U.S.C. §103(a) over U.S. Patent No. 6,389,464 to Krishnamurthy et al. (hereinafter referred to as “Krishnamurthy”) in view of U.S. Patent No. 5,913,037 to Spofford et al. (hereinafter referred to as “Spofford”) and further in view of U.S. Patent No. 6,662,208 to Moeller et al. (hereinafter referred to as “Moeller”).

III. REMARKS

A. The Features Addressed in Appellants' Arguments Are Recited in the Claims

In the “Response to Argument” of the Examiner’s Answer, section (10), the Examiner again asserts that Appellants have argued features that are not recited in rejected claims. The Examiner alleges that the features of “directly querying a router” and “integration of an HTTP daemon into a packet router” are not recited in the claims. This is incorrect.

Claim 1 recites “receiving a connection of a Web browser to a network packet router,” and “receiving … within the network packet router, an HTTP request message from the browser to obtain the current value of a MIB variable from the router to which the variable pertains.” The recited features are equivalent to “directly querying a router.” Every appellant is entitled to some freedom in paraphrasing the claim features to summarize functionality that is clearly recited in a claim, for clarity, brevity and cogency in presenting an argument. Anyone of skill in the relevant art would understand that the claim terms are equivalent to “directly querying a router.” The Examiner’s position is excessively literal.

Moreover, the claim language contrasts starkly with the cited prior art references. For example, Krishnamurthy describes a site server that receives communication via an intermediary server. Claim 1 recites receiving a connection at the router, not at an intermediary server. Claim 1 recites receiving a request message at the router, not at an intermediate device. For at least these reasons, Claim 1 clearly distinguishes over Krishnamurthy.

Further, each of independent Claims 1, 11, 17, 23, 24 and 31 recites one or more features associated with an HTTP daemon executed by and hosted within a network packet router. For example, the HTTP daemon is “executed by and hosted within the network packet router.” Thus, all the claims provide “integration of an HTTP daemon into a packet router,” as paraphrased in

Appellants' opening brief. The Examiner's literalism merely deflects attention from the features of the claims, and from the clear differences of the claims as compared to the references.

B. The Examiner Concedes the "Grouping" Issue

Appellants previously argued that Claims 1-44 do not stand or fall together. The Examiner's Answer of April 20, 2006 does not address the issue, which appears to be conceded by the Office.

IV. CONCLUSION

For the reasons set forth herein and in Appellants' prior briefs, Claims 1-44 present subject matter that is patentable over the references of record, and are in condition for allowance. Therefore, Appellants respectfully request reversal of the final rejections.

Throughout the pendency of this Application the Commissioner is hereby authorized to charge any applicable fee, including extension of time fees, and to credit any overpayment to our Deposit Account No. 50-1302.

Respectfully submitted,

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Date: 6-20-2006

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